



BORENSTEIN | McCONNELL | CALPIN  
ATTORNEYS AT LAW

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July 15, 2021

**Via UPS Overnight & Hand Delivery**

Betty Sebrow  
12 Beechwood Drive  
Lawrence, NY 11519

**Re: Harvey J. Bell v. Betty Sebrow  
New Jersey Domestic Violence Civil Complaint and Temporary  
Restraining Order Police Case # 21021279.**

Dear Ms. Sebrow:

Borenstein McConnell & Calpin, P.C. ("BMC") represents Harvey Bell in the above captioned matter. Please find attached a New Jersey Domestic Violence Civil Complaint and Temporary Restraining Order that was entered on July 15, 2021. A Zoom Hearing in this matter has been scheduled for July 22, 2021, at 8:30 a.m. Please contact the family Court in Essex County at 973-776-9300 ext. 57210 for the Zoom information.

Yours truly,

A handwritten signature in black ink, appearing to read "ABRAHAM BORENSTEIN, ESQ.", is written over a stylized, horizontal, oval-shaped flourish.

ABRAHAM BORENSTEIN, ESQ.

BA/abr  
Enc.  
Cc: Client via Email

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Springfield  
155 Morris Avenue  
Suite 201  
Springfield, NJ 07081

Lebanon  
3 Werner Way  
Suite 230  
Lebanon, NJ 08833

New York City  
4607 Fort Hamilton Parkway  
Brooklyn, NY 11219

**Due to the COVID-19 pandemic, please do not appear at the Courthouse. Your case may be heard remotely. Upon receipt of this order, you must contact the Family court immediately to get instructions for the date of your Final Restraining Order hearing. For your convenience all county Family Court numbers are listed below. All restraints remain in full force and effect until the final hearing.**

**Family Court  
County Phone  
Numbers**

<b>Atlantic</b>	609-402-0100 x47580
<b>Bergen</b>	201-221-0700 x25185
<b>Burlington</b>	609-288-9500 x38834
<b>Cape May</b>	609-402-0100 x47710
<b>Camden</b>	856-650-9100 x43520
<b>Cumberland</b>	856-878-5050 x15640
<b>Essex</b>	973-776-9300 x57210
<b>Gloucester</b>	856-878-5050 x15520
<b>Hudson</b>	201-748-4400 x60830 201-748-4400 x60810
<b>Hunterdon</b>	908-824-9750 x13350
<b>Mercer</b>	609-571-4200 x74402
<b>Middlesex</b>	732-645-4300 x88560
<b>Monmouth</b>	732-358-8700 x87211 732-358-8700 x87160
<b>Morris</b>	862-397-5700 x75250
<b>Ocean</b>	732-504-0700 x64090
<b>Passaic</b>	973-653-2910 x24624
<b>Salem</b>	856-878-5050 x15881
<b>Somerset</b>	908-332-7700 x13007
<b>Sussex</b>	862-397-5700 x75184
<b>Union</b>	English: 908-787-1650 x21710 Spanish: 908-787-1650 x21720
<b>Warren</b>	908-750-8100 x13480

<input checked="" type="checkbox"/> TRO <input type="checkbox"/> Amended TRO					<input checked="" type="checkbox"/> Municipal Court of WEST ORANGE TOWN	
<input type="checkbox"/> Superior Court, Chancery Division, Family Part,		County				
Docket Number		Police Case Number 21021279				
In the Matter of Plaintiff (Victim) BELL HARVEY J				Plaintiff's Sex <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female	Plaintiff's Date of Birth 12/21/1955	
Defendant Information		Last Name SEBROW	First Name BETTY	Initial B	Defendant's Sex <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	Race CAUCASIAN
AKA		Defendant's Social Security Number		Date of Birth 02/01/1964	Height 5' 02	Weight
Home Address 12 BEECHWOOD DRIVE		City LAWRENCE	State NY	Zip 11559	Eye Color HAZEL	Hair Color
Home Phone Number (516)849-5863		Work Phone Number		Distinguishing Features (Scars, Facial Hair, Etc.)		
Employer				Driver's License Number		
Work Address				State	Driver's License Expiration Date	
The undersigned complains that said defendant did endanger plaintiff's life, health or well being (give specific facts regarding acts or threats of abuse and the date(s) and time(s) they occurred; specify any weapons):						
ON (Date) 07/14/2021	AT (Time) 09:21 AM	BY (Details; specify any weapons)  MR. BELL STATES THAT IN THE FALL OF 2018, HE BEGAN A DATING RELATIONSHIP WITH MS. BAILA SEBROW. AFTER APPROXIMATELY 6 TO 8 WEEKS OF DATING, MR. BELL ADVISED MS. SEBROW THAT HE WISHED TO END THE RELATIONSHIP. SHORTLY AFTERWARDS, MR. BELL STATES MS. SEBROW BEGAN TO SEND NUMEROUS TEXT MESSAGES WHICH CONTAINED VULGAR AND SEXUALLY EXPLICIT LANGUAGE. MR. BELL STATES HE INFORMED MS. SEBROW THAT HE NO LONGER DESIRED TO HAVE ANY FURTHER COMMUNICATION BETWEEN THE TWO.  SINCE 2018, MR. BELL STATES THAT ON NUMEROUS OCCASIONS, MS. SEBROW HAS SENT TEXT MESSAGES AND EMAILS IN WHICH SHE FALSELY ACCUSES MR. BELL AS BEING A RAPIST WITH MULTIPLE FEMALE VICTIMS. MS. SEBROW HAS THREATENED TO INFORM MR. BELL'S EMPLOYER OF THESE FALSE ALLEGATIONS. MR. BELL STATES MS. SEBROW HAS CONTACTED HIS FEMALE FRIENDS AND ASSOCIATES, IN AN ATTEMPT TO GATHER INFORMATION REGARDING HIS PAST SEXUAL HISTORY. MR. BELL ALSO STATES THAT HE HAS SEEN MS. SEBROW PRESENT AT THE SAME RELIGIOUS EVENTS HE ATTENDS. HE STATES THAT MS. SEBROW WOULD TYPICALLY NOT TAKE PART IN THESE GATHERINGS, BUT BELIEVES SHE DOES SO BECAUSE SHE IS AWARE HE WILL BE IN ATTENDANCE.  RECENTLY, MR. BELL STATES CONTACT WITH MS. SEBROW HAS BEEN SPARSE AND INFREQUENT, BUT STATES HE HAS RECEIVED TEXT MESSAGES FROM UNKNOWN PHONE NUMBERS, CONTAINING SIMILAR CONTENT TO THE MESSAGES LEFT BY MS. SEBROW. MR. BELL BELIEVES MS. SEBROW IS USING THESE UNKNOWN PHONE NUMBERS TO CONTINUE THE HARASSING COMMUNICATION.  MR. BELL OFTEN SEARCHES HIS NAME ON GOOGLE TO SEE IF ANYTHING HAS BEEN WRITTEN ABOUT HIM. RECENTLY THROUGH GOOGLE'S SEARCH ENGINE, MR. BELL DISCOVERED A TWITTER ACCOUNT TITLED "HARVEY BELL AND THE ISSUES OF DATE RAPE" WITH THE TWITTER HANDLE NAMED "@HARVEYDATERAPE". IN THE DESCRIPTION OF THE ACCOUNT, THE FOLLOWING IS WRITTEN: "HARVEY BELL, A 64 YEAR OLD FINANCIAL ADVISOR IN WEST ORANGE, NJ IS ACCUSED BY POLICE OF INCAPACITATING 100S OF VICTIMS BY PLYING THEM WITH DATE RAPE DRUGS." MR. BELL IS FEARFUL THAT HIS REPUTATION IS BEING SLANDERED DUE TO THESE CONSTANT FALSE ALLEGATIONS.				
which constitute(s) the following criminal offense(s): (Check all applicable boxes. Law Enforcement Officer: Attach N.J.S.P. UCR DV1 offense report(s)):						
<input type="checkbox"/> Homicide	<input type="checkbox"/> Terroristic Threats	<input type="checkbox"/> Criminal Restraint	<input type="checkbox"/> Sexual Assault	<input type="checkbox"/> Lewdness	<input type="checkbox"/> Burglary	<input checked="" type="checkbox"/> Harassment
<input type="checkbox"/> Assault	<input type="checkbox"/> Kidnapping	<input type="checkbox"/> False Imprisonment	<input type="checkbox"/> Criminal Sexual Contact	<input type="checkbox"/> Criminal Mischief	<input type="checkbox"/> Criminal Trespass	<input type="checkbox"/> Stalking
<input type="checkbox"/> Criminal Coercion	<input type="checkbox"/> Robbery	<input type="checkbox"/> Contempt of a DV Order	<input type="checkbox"/> Any Other Crime Involving Risk of Death or Serious Bodily Injury			<input type="checkbox"/> Cyber Harassment
1. Any prior history of domestic violence reported or unreported? If Yes, explain: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No						
2. Does Defendant have a criminal history? (If Yes, submit any available criminal history report) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No						
3. Any prior or pending court proceedings involving parties? (If Yes, enter docket number, court, county, state) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No						
4. Has a criminal complaint been filed in this matter? (If Yes, enter date, docket number, court, county, state) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No						
5. If Law Enforcement Officers responded to a domestic violence call: Were weapons seized? If Yes, describe: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Was Defendant arrested? If Yes, describe: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No						
6. (A) The Plaintiff and Defendant are 18 years old or older or emancipated and are: (select one) <input type="checkbox"/> Married / Civil Union <input type="checkbox"/> Divorced <input type="checkbox"/> Present Household Member <input type="checkbox"/> Was at Any Time a Household Member OR (B) The Defendant is 18 years old or older or emancipated and Plaintiff and Defendant are: (select one) <input type="checkbox"/> Unmarried <input type="checkbox"/> Co-Parents <input type="checkbox"/> Expectant Parents <input checked="" type="checkbox"/> Plaintiff and Defendant have had a dating relationship						

Docket Number	Defendant's Name <b>BETTY SEBROW</b>			
7. Where appropriate list children you have with the Defendant, if any (include name, sex, date of birth, person with whom child resides)				
Child's Name: Last	First	M.I.	Sex	Birth Date
8. The Plaintiff and Defendant: <input type="checkbox"/> Presently; <input type="checkbox"/> Previously; <input checked="" type="checkbox"/> Never: Resided Together <input type="checkbox"/> Family Relationship: What is your relationship to the defendant? _____ (Specify)				
<b>Certification</b> I certify that the foregoing responses made by me are true. I am aware that if any of the foregoing responses made by me are willfully false, I am subject to punishment.				
07/15/2021 Date		HARVEY J BELL Signature of Plaintiff		

**NOTICE TO DEFENDANT:** A violation of any of the provisions listed in this order may constitute either civil or criminal contempt pursuant to N.J.S.A. 2C:25-30 and may result in your arrest, prosecution, and possible incarceration, as well as an imposition of a fine or jail sentence. Only a court can modify any of the terms or conditions of this court order.

Docket Number

Defendant's Name  
**BETTY SEBROW**

**Part 1 - RELIEF - Instructions: Relief sought by Plaintiff****DEFENDANT:**

TRO FRO TRO Granted

1.  N/A  You are prohibited from returning to the scene of violence.
2.   You are prohibited from future acts of domestic violence.
3.   You are barred from the following locations:  Residence(s) of Plaintiff  Place(s) of employment of Plaintiff  
 Other (Only list addresses known to Defendant):
4.   You are prohibited from having **any** oral, written, personal, electronic, or other form of contact or communication with Plaintiff.  
 Other(s): PERRY JACOB BELL, VICTORIA SMULEVITZ, ALEXANDRIA BELL, AVERY SOLOMON BELL, JEFF SMULEVITZ, ELISHA MLOTEK, CHANA BELL
5.   You are prohibited from making or causing anyone else to make harassing communications to: Plaintiff  
 Other(s) - Same as Item 4 above or list names:
6.   You are prohibited from stalking, following or threatening to harm, stalk or follow: Plaintiff  
 Other(s) - Same as item 4 above or list names:
7.   You must pay emergent monetary relief to (describe amount and method):  
 Plaintiff:  
 Dependent(s):
8.   You must be subject to intake monitoring of conditions and restraints:  
 Other (evaluations or treatment - describe):
9.   Psychiatric evaluation:
10.    **Prohibition Against Possession of Weapons:** You are prohibited from possessing **any and all firearms or other weapons** and must immediately surrender these firearms, weapons, permit(s) to carry, application(s) to purchase firearms and firearms purchaser ID card to the officer serving this Court Order. Failure to do so may result in your arrest and incarceration.

**PLAINTIFF:**

11.   You are granted exclusive possession of (list residence or alternate housing only if specifically known to defendant):
12.   You are granted temporary custody of:
13.   Other relief for - Plaintiff:  
  Other relief for - Children:

**LAW ENFORCEMENT OFFICER:**

You are to accompany to scene, residence, shared place of business, other (indicate address, time, duration and purpose):

  Plaintiff:  Defendant:

**NOTICE TO DEFENDANT:** A violation of any of the provisions listed in this order may constitute either civil or criminal contempt pursuant to N.J.S.A. 2C:25-30 and may result in your arrest, prosecution, and possible incarceration, as well as an imposition of a fine or jail sentence. Only a court can modify any of the terms or conditions of this court order.

Docket Number

Defendant's Name  
**BETTY SEBROW****Warrant to Search for and to Seize Weapons for Safekeeping**

- To any law enforcement officer having jurisdiction - this Order shall serve as a warrant to search for and to seize any issued permit to carry a firearm, application to purchase a firearm and firearms purchaser identification card issued to the defendant and the following firearm(s) or other weapon(s). Describe the weapons to be seized:

1. You are hereby commanded to search for the above described weapons and/or permits to carry a firearm, application to purchase a firearm and firearms purchaser identification card and to serve a copy of this Order upon the person at the premises or location described as:

2. You are hereby ordered in the event you seize any of the above described weapons, to give a receipt for the property so seized to the person from whom they were taken or in whose possession they were found, or in the absence of such person to have a copy of this Order together with such receipt in or upon the said structure from which the property was taken.

3. You are authorized to execute this Order immediately or as soon thereafter as is practicable:

Anytime     Other: \_\_\_\_\_

4. You are further ordered, after the execution of this Order, to promptly provide the Court with a written inventory of the property seized per this Order.

**Part 2 - RELIEF - DEFENDANT:**

TRO   FRO   TRO Granted

1.    No parenting time / visitation until further ordered;
- Parenting time / visitation pursuant to \_\_\_\_\_ suspended until further order: \_\_\_\_\_
- Parenting time / visitation permitted as follows:
  
2.    Risk assessment ordered (specify by whom, any requirements, dates):
  
3.   You must provide compensation as follows:
  - Emergent support for Plaintiff: \_\_\_\_\_
  - for Dependent(s): \_\_\_\_\_
  - N/A   Ongoing support for Plaintiff: \_\_\_\_\_
  - N/A   for Dependent(s): \_\_\_\_\_
  - Compensatory damages to Plaintiff: \_\_\_\_\_
  - N/A   Punitive damages to Plaintiff: \_\_\_\_\_
  - N/A   to Third Party(ies) (describe): \_\_\_\_\_
  - Medical coverage for Plaintiff: \_\_\_\_\_
  - for Dependent(s): \_\_\_\_\_
  - Rent     Mortgage payments (specify amount(s) and recipient(s)): \_\_\_\_\_
  
- You must participate in a batterers intervention program:
  
- You are granted temporary possession of the following personal property (describe):

**Part 2 - RELIEF - PLAINTIFF:**

- You are granted temporary possession of the following personal property (describe):

Comments:

**NOTICE TO DEFENDANT:** A violation of any of the provisions listed in this order may constitute either civil or criminal contempt pursuant to N.J.S.A. 2C:25-30 and may result in your arrest, prosecution, and possible incarceration, as well as an imposition of a fine or jail sentence. Only a court can modify any of the terms or conditions of this court order.

Docket Number	Defendant's Name <b>BETTY SEBROW</b>
<b>Addendum:</b>	
<input type="checkbox"/> TRO denied. Complaint dismissed by Family Part. <input type="checkbox"/> TRO denied by Municipal Court. <input type="checkbox"/> TRO denied by Superior Court Judge at De Novo Hearing. <input type="checkbox"/> TRO granted by Superior Court Judge at De Novo Hearing. The Court has established jurisdiction over the subject matter and the parties pursuant to N.J.S.A. 2C:25-17 et seq., and has found good cause that a prima facie act of domestic violence has been established; that an immediate danger of domestic violence exists and that plaintiff's life, health and well being are endangered; that an emergency restraining Order is necessary pursuant to R. 5:7A(b) and N.J.S.A. 2C:25-28 to prevent the occurrence or recurrence of domestic violence and to search for and seize firearms and other weapons as indicated in this order. <input checked="" type="checkbox"/> TRO granted. The Court has established jurisdiction over the subject matter and the parties pursuant to N.J.S.A. 2C:25-17 et seq., and has found good cause that a prima facie act of domestic violence has been established; that an immediate danger of domestic violence exists and that plaintiff's life, health and well being are endangered; that an emergency restraining Order is necessary pursuant to R. 5:7A(b) and N.J.S.A. 2C:25-28 to prevent the occurrence or recurrence of domestic violence and to search for and seize firearms and other weapons as indicated in this order.	
s/ Hearing Officer s/DENNIS DOWD Honorable Municipal Court Judge	
WEST ORANGE TOWN ESSEX Court / County	
<input type="checkbox"/> Via Telecommunications Date/Time 07/15/2021 12:36 PM <input checked="" type="checkbox"/> Via Telecommunications Date/Time <input type="checkbox"/> Via Telecommunications Date/Time	
s/ Honorable Superior Court Judge Court / County	
<b>All Law Enforcement Officers Will Serve and Fully Enforce This Order</b>	
<p>This ex parte Domestic Violence Complaint and Temporary Restraining Order meets the criteria of the federal Violence Against Women Act for enforcement outside of the State of New Jersey upon verification of service of defendant. 18 U.S.C.A. 2265 &amp; 2266</p> <p><b>This Order Shall Remain in Effect Until Further Order of the Court and Service of Said Order on the Defendant.</b></p> <p><b>Notice to Appear to Plaintiff and Defendant</b></p> <p>1. <input checked="" type="checkbox"/> Both the plaintiff and defendant are ordered to appear for a final hearing on (date) <u>07/22/2021</u> at (time) <u>08:30 AM</u> at the Superior Court, Chancery Division, Family Part, <u>ESSEX</u> County, located at (address) <u>WILENTZ COURT COMPLEX, 212 WASHINGTON ST, 12TH FLOOR, NEWARK, NJ 07102, 973-776-9300 X57210</u></p> <p>Note: You must bring financial information including pay stubs, insurance information, bills and mortgage receipts with you to Court.</p> <p>2. <input type="checkbox"/> Remote: All parties shall appear for a hearing on _____ at _____.      I. <input type="checkbox"/> Video Remote Hearing is scheduled at the above date and time. You must attend via video as scheduled. Please contact the court for further details at _____.      II. <input type="checkbox"/> Phone Remote Hearing is scheduled at the above date and time. You must attend via Phone as scheduled. Please contact the court for further details at _____.      III. <input type="checkbox"/> Remote Hearing is scheduled at the above date and time. You must attend as scheduled. Please contact the court for further details at _____.      IV. <input type="checkbox"/> The proceeding will be conducted on the papers. Please contact the court for details _____.</p> <p>3. <input type="checkbox"/> The final hearing in this matter shall not be scheduled until: _____</p> <p>4. <input type="checkbox"/> Interpreter needed. Language: _____      Upon satisfaction of the above-noted conditions notify the Court immediately so that a final hearing date may be set.</p> <p><b>IMPORTANT: The parties cannot themselves change the terms of this Order on their own. This Order may only be changed or dismissed by the Superior Court. The named defendant cannot have any contact with the plaintiff without permission of the Court.</b></p> <p><b>Notice to Defendant</b></p> <p>A violation of any of the provisions listed in this Order or a failure to comply with the directive to surrender all weapons, firearm permits, applications or identification cards may constitute criminal contempt pursuant to N.J.S.A. 2C:29-9(b), and may also constitute violations of other state and federal laws which may result in your arrest and/or criminal prosecution. This may result in a jail sentence.</p> <p>You have the right to immediately file an appeal of this temporary Order before the Superior Court, Chancery Division, Family Part, as indicated above and a hearing may be scheduled.</p>	

Docket Number

Defendant's Name  
**BETTY SEBROW****Return of Service** Plaintiff was given a copy of the Complaint / TRO by:

HANSON PATRICK

12:36 PM 07/15/2021

WEST ORANGE POLICE DEPT.

Print Name

Time and Date

Signature / Badge Number / Department

 I hereby certify that I served the within Complaint / TRO by delivering a copy to the Defendant personally:

Print Name

Time and Date

Signature / Badge Number / Department

 I hereby certify that I served the within Complaint / TRO by use of substituted service as follows:

Print Name

Time and Date

Signature / Badge Number / Department

 Defendant could not be served (explain):

Print Name

Time and Date

Signature / Badge Number / Department

**The Courthouse is accessible to those with disabilities. Please notify the Court if you require assistance.**

Distribution: Family Part, Plaintiff, Defendant, Sheriff, Other